

MEMORANDUM

March 21, 1985

To: Mark S. Coleman, Deputy Commissioner
for Environmental Health Services

From: Dale McHard, Chief *DM*
Radiation and Special Hazards Service

Subject: Sooner Dial Company site, Clinton--Additional
Investigative Issues

This memo is to present additional issues which should be investigated to the extent necessary to determine any information pertinent to overall program effort in regard to the radium contamination existing at the Sooner Dial Company site. Reference should be made to the memoranda and letters written in connection with this case since February 5, 1985.

1. Sewer/septic tank system--Mr. Thiesson, Custer County Health Department, has been asked to make a preliminary determination whether this site has been served by sewers or septic tank systems since at least 1965. If it is determined that a septic tank system was utilized (particularly during the time radium dial stripping was conducted), additional investigation in this regard will be required.
2. Ownership of the property--A record search of Custer County records should be conducted to determine each and every owner of this property since at least 1965. Written or personal contact with each of the owners so identified may be necessary.
3. Description of property--A legal description of the property, particularly in regard to defining easements and setting forth boundaries, should be obtained.
4. Scale or plat map--If a scale or plat map is readily available in the county records, a copy of such map should be obtained for our use.
5. Water/sewer line--We suspect that a water or sewer line at the back of the property has been constructed or has had repairs recently. The City of Clinton should be requested to give us information in this regard; if it is determined that a crew has been working in this area, it probably will be necessary to interview the contractor or foreman of the crew.

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6. Legal opinion--It would be helpful if we could obtain a copy of the court's opinion and the case summary of Johnston vs USA which involved a radium paint stripping operation in Wichita, Kansas.

7. Possible sources to defray clean-up costs--An investigation should be made to determine any connection between Sooner Dial and its owners and Luminous Products, a now-defunct corporation. Safety Light Corporation, Bloomsburg, Pennsylvania is an apparent successor company to Luminous. If investigation reveals a connection between Sooner Dial and Luminous, then there may exist potential liability in regard to clean-up of the site.

DMC/bh

cc: Bob Kellogg
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